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25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

27 CHASOM BROWN, *et al.*, on behalf of
28 themselves and all others similarly situated,

29 Plaintiffs,

30 v.

31 GOOGLE LLC,

32 Defendant.

33 Case No. 4:20-cv-03664-YGR-SVK

34 **DECLARATION OF STEPHEN A.
35 BROOME IN SUPPORT OF GOOGLE
36 LLC’S OPPOSITION TO SALCIDO
37 PLAINTIFFS’ MOTION TO
38 INTERVENE AND TO CONTINUE THE
39 FINAL APPROVAL HEARING**

40 The Honorable Yvonne Gonzalez Rogers
41 Courtroom 1 – 4th Floor
42 Date: August 7, 2024
43 Time: 2:00 p.m.

DECLARATION OF STEPHEN A. BROOME

I, Stephen A. Broome, declare as follows:

1. I am a member of the bar of the State of California and a partner with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit this declaration in support of Google LLC’s Opposition to *Salcido* Plaintiffs’ Motion to Intervene and to Continue the Final Approval Hearing. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an excerpt from the transcript of the November 29, 2023 pretrial conference in this matter.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Tolling and Confidentiality Agreement between Google and certain plaintiffs represented by Boies Schiller Flexner LLP and Morgan & Morgan, dated November 13, 2023.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of July, 2024, at Los Angeles, California.

By /s/ *Stephen A. Broome*
Stephen A. Broome